

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 11-11019-JGD

GREGORY T. BROWN

Plaintiff

v.

ESSEX COUNTY, et al.

Defendants

**DEFENDANTS' PROPOSED VOIR DIRE**

Now come the Defendants and hereby request the following questions be asked of the jury:

1. Is there anyone on the jury who feels he/she cannot sit as an impartial juror because the case involves the actions of correction officers? Are you more inclined to believe the testimony of witnesses who are not correction officers?
2. Does anyone on the jury believe that they or members of their family or their friends or acquaintances have been unreasonably treated by correction officers in general or by the Essex County Sheriff's Department in particular?
3. Has anyone on the jury or members of their family or their friends or acquaintances been detained by the Essex County Sheriff's Department?
4. Is there any member of the jury panel, their family or their friends or acquaintances that has brought a lawsuit against a correction officer, Sheriff's Department or law enforcement official or department?

5. Is there any member of the jury panel, their family or their friends or acquaintances that has alleged that they have been a victim of a civil rights violation?
6. Has anyone on the jury or members of their family or their friends or acquaintances read or heard about this case in newspapers, radio, television or other media source?
7. Is there any member of the jury panel who has an unfavorable opinion or view of correction officers in general, or the Essex County Sheriff's Department in particular?
8. Does the fact that you will be hearing testimony from correctional personnel influence your duty to be fair and impartial and to render your decision based on the facts presented?
9. Does the fact that the Essex County Sheriff's Department is the employer of the defendants make it difficult for you to be fair and impartial?

Defendants,

by their attorneys,

*/s/Stephen C. Pfaff*

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**CERTIFICATE OF SERVICE**

I, Stephen C. Pfaff, hereby certify that on the 16<sup>th</sup> day of July, 2013, I served the foregoing electronically to the following:

John R. Bitá III, Of Counsel  
Milligan Coughlin LLC  
Seven Liberty Square – 2nd Floor  
Boston, Massachusetts 02109

*/s/Stephen C. Pfaff*

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Stephen C. Pfaff